

BEFORE THE
POSTAL RATE COMMISSION

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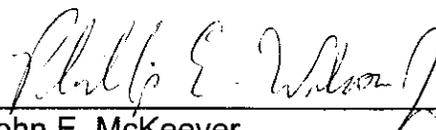
POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

INTERROGATORIES FROM UNITED PARCEL
SERVICE TO UNITED STATES POSTAL
SERVICE WITNESS DEGEN
(UPS/USPS-T16-5 through 6
(March 6, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories directed to United States Postal Service witness Degen: UPS/USPS-T16-5 through 6.

Respectfully submitted,



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INTERROGATORIES OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS DEGEN

UPS/USPS-T16-5. Refer to page 36 of your testimony, where you state that “most primary parcel sortation occurs in BMCs.” Refer also to page 44 of your testimony, where you state that “[o]utgoing parcels are sent to the BMC without any sortation.” Refer also to page 45 of your testimony, where in your discussion of Manual Flat Sortation and the Small Parcel Bundle Sorter (“SPBS”), you state that “The SPBS sorts parcels and bundles when the keyers enter a numeric code--the first few digits of the ZIP Code for an outgoing scheme” Explain this apparent contradiction.

UPS/USPS-T16-6. Refer to pages 32 through 34 of your testimony, where you indicate that the standard operating plan for the piece sortation of letters begins with cancellation and culling of automation incompatible letters from the mailstream. Automation incompatible letters are then either sorted manually or sorted on a letter sorting machine (“LSM”). Automation compatible pieces are sent either directly to the bar code sorter (“BCS”) or are diverted into various processing streams that prepare them for eventual sortation by the BCS.

(a) Confirm that under the standard operating plan, all the actual sortation of letters is performed either manually, by an LSM, or by a BCS. If not confirmed, identify all of the other operations in which letters are sorted, and describe the types and approximate percentages of mail sorted in these other ways.

(b) Specify the number of times under the standard operating plan that a specific letter at a specific processing plant would be processed either manually, through an LSM, or through a BCS before leaving the plant.

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(c) If the answer to (b) varies either from letter to letter or from plant to plant, indicate the minimum number of times a letter would be processed in one of these three operations under the standard operating plan, and the maximum number of times it would be processed.

(d) If the answer to (b) above varies either from letter to letter or from plant to plant, describe the circumstances and conditions that determine how many times a letter would be processed.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Commission's Rules of Practice.



Philip E. Wilson, Jr.
Attorney for United Parcel Service

Dated: March 6, 2000
Philadelphia, Pa.

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